

ROUX MEMORANDUM

TO: Mike Cirian, USEPA
FROM: Michael Ritorto, Roux Associates
CC: John Stroiazzo, Glencore
Steve Wright, CFAC
Lisa DeWitt, MDEQ
Dick Sloan, MDEQ
Andrew Baris, Roux Associates
DATE: October 16, 2017
RE: Minutes for Project Update Meetings – October 5, 2017
CFAC Remedial Investigation / Feasibility Study
Columbia Falls, Montana

A project update meeting was held on Thursday, October 5, 2017 at the CFAC facility (2000 Aluminum Drive, Columbia Falls, MT) from approximately 1:45 pm to 5 pm MT. The following individuals attended all or portions of the meeting as indicated below:

- Mike Cirian – USEPA
- Jody Ostendorf – USEPA Congressional and Intergovernmental Relations Liaison
- Susan Griffin – USEPA Risk Assessor
- Richard Sloan – MDEQ
- Cheryl Driscoll – Glencore (portion of meeting)
- John Stroiazzo – Glencore
- Steve Wright – CFAC
- Michael Ritorto – Roux Associates
- Laura Jensen – Roux Associates

The meeting agenda included the following items:

- The group attended a Site tour conducted by CFAC for those new to the Site (i.e., Jody Ostendorf, Susan Griffin, and Richard Sloan). Various Site features were visited;
- The group discussed the potential municipal solid waste landfill mentioned in a historic Hungry Horse News article;
- The group reviewed and discussed the proposed approach for the Expedited Risk Assessment in the South Percolation Ponds;
- The group reviewed and discussed the historic production well data provided by CFAC;

- The group reviewed and discussed the Phase I Site Characterization schedule, including all items completed to date and upcoming work. Specific discussions included background analysis and schedule for Baseline Human Health and Ecological Risk Assessment Work Plans;
- The group discussed the Candidate Technology Memorandum scope and schedule;
- The group discussed the Main Plant utility tunnel;
- The group discussed potential fluoride in vegetation; and
- The group discussed preparation for the Community Liaison Panel / Public Meeting (Thursday, October 5, 2017) and presentation of the updated groundwater and surface water results to the public. The group left the Site at approximately 5 pm to attend the Community Liaison Panel / Public Meeting lead by Ann Green of Ann Green Communications and CFAC. The proposed agenda for the meeting was as follows:
 - Welcome, Introductions, Goals of the Meeting, Review of the Agenda;
 - Communications Update by CFAC and Agencies (USEPA/MDEQ);
 - Historical Perspective narrative provided by Nino Berube (former CFAC employee);
 - USEPA Update;
 - Project Update, including demolition progress, aluminum city well testing, RI/FS update including groundwater/surface water update and summer 2017 scope of work, and next steps; and
 - Questions/Comments, Next Meeting, Adjournment.

Technical Meeting Highlights and Paths Forward

- CFAC conducted a title search and researched their ownership history regarding the location of a potential municipal solid waste landfill mentioned in a historic Hungry Horse News article. The group discussed that the location mentioned in the Hungry Horse News article is outside the RI/FS Site Boundary and any municipal solid waste landfill would not have been associated with CFAC operations. Therefore, the potential landfill will not be investigated as part of the RI/FS.
- The proposed sampling locations for the Expedited Risk Assessment in the South Percolation Ponds were reviewed by the group. CFAC/Roux will provide USEPA a timeline for the proposed sampling and a scope of work prior to the sampling in late October/November 2017. Mike Cirian suggested to discuss the conditions and plans for the ponds during the CLP meeting. CFAC/Roux/Morrison-Maierle is meeting with the Flathead County Conservation District Board on October 10, 2017 to discuss the permit

approval for the plan. CFAC will provide Mike Cirian a copy of the design drawings for constructing a rip-rap trench to protect the ponds.

- The group reviewed and discussed the historic production well data. CFAC/Roux prepared graphs presenting the historic fluoride and cyanide concentrations for the production wells.
- The group discussed the schedule and path forward for 2017/early 2018, including the following major tasks:
 - CFAC/Roux is preparing the Asbestos Landfill Surface Soil Sampling Results Memorandum. The memorandum is estimated to be submitted to USEPA in October 2017;
 - CFAC/Roux is preparing the Groundwater and Surface Water Data Summary Report, which will include results and analysis of the four rounds of groundwater and surface water sampling and the results of the slug testing performed during Summer of 2017. The Data Summary Report is estimated to be submitted to USEPA in November 2017;
 - CFAC/Roux/EHS Support will prepare a Baseline Human Health Risk Assessment Work Plan (BHHRA WP) and a Baseline Ecological Risk Assessment Work Plan (BERA WP) to be submitted to USEPA and USEPA's risk assessors following approval of the Final Phase I Data Summary Report and SLERA. The submittal date for both Work Plans is scheduled for November 2017; and
 - CFAC/Roux will utilize the results from the Phase I Site Characterization and information in the BHHRA WP and BERA WP to develop a Scope of Work for the Phase II Site Characterization. The Scope of Work will be summarized in a Phase II Sampling and Analysis Plan (Phase II SAP), to be submitted in early 2018.
- The group discussed that a Project Update/Technical Meeting should take place in early 2018 after the submittal of the Risk Assessment Work Plans to discuss the data gaps identified as part of the Risk Assessment Work Plans and to discuss the scope of the Phase II Sampling and Analysis Plan.
- The group discussed the schedule for the Candidate Technology Memorandum. CFAC/Roux proposed to delay the submittal of the Memorandum until after the completion of the Phase II Site Characterization and Risk Assessments to allow for more accurate identification of where remedial measures may actually be required. Mike Cirian provided verbal concurrence with this approach, but requested a letter to be submitted for formal approval by USEPA.

- The group discussed USEPA inquiries regarding the Main Plant utility tunnel. Investigation of the tunnel will be considered as part of the preparation of the Phase II SAP.
- The group discussed USEPA inquiries regarding the potential for fluoride in vegetation. CFAC/Roux provided literature to USEPA for their review to support that no fluoride vegetation sampling is needed to complete the RI/FS.
- The group discussed that the next public meeting will be scheduled for May 2018. The public meeting will be conducted at the CFAC facility to present the demolition changes that have taken place at the Site. The path forward for the project will also be presented.

-----**End of Minutes for Project Update Meeting**-----